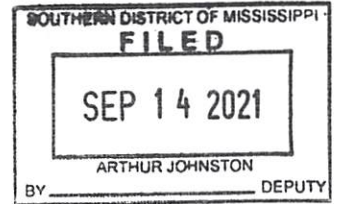


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION



RONNIE TEATER and  
VICTOR BRAYDEN TEATER

PLAINTIFFS

v.

CIVIL ACTION NO. 3:21cv591-KHJ-MTP

MONTEZUMAS REVENGE, INC. and  
COREY MONSHAW DUNBAR

DEFENDANTS

NOTICE OF REMOVAL

COME NOW the Defendants, Montezumas Revenge, Inc. and Corey Monshaw Dunbar, by and through undersigned counsel, and file this, their Notice of Removal of this civil action from the Circuit Court of Simpson County, Mississippi to the United States District Court for the Southern District of Mississippi, Northern Division. In support of said Notice of Removal, the Defendants would show unto the Court the following:

1. There is now pending in the Circuit Court of Simpson County, Mississippi, a certain civil action styled *Ronnie Teater and Victor Brayden Teater v. Montezumas Revenge, Inc. and Corey Monshaw Dunbar*, bearing Civil Action No.: 21-cv-275. A copy of all pleadings and Orders entered in connection to the State Court action have been requested and will be filed with this Court within fourteen (14) days.

2. This civil action filed by the Plaintiffs allege that the Plaintiffs are entitled to recover damages as a result of injuries that they sustained in an automobile accident. The United States District Court for the Southern District of Mississippi, Northern Division is the proper district and division for removal from the Circuit Court of Simpson County, Mississippi to

Federal Court. The Defendant was served with the Complaint on August 24, 2021, so this Removal is being filed within thirty (30) days of service of process.

3. Although the Plaintiffs do not specifically ask for an amount in their lawsuit, from conversations with Plaintiffs' counsel the Plaintiffs have admitted that the amount in controversy exceeds the sum of \$75,000. Specifically, the Plaintiffs allege in their suit that they sustained "serious life threatening injuries" "all of which will continue into the future". The Plaintiffs further claim that they sustained loss of income as well as scarring, emotional distress, as well as pain and suffering. From the description in the Complaint, as well as conversations with Plaintiffs' counsel, it is clear that the amount in controversy exceeds the total sum of \$75,000, which satisfies the removal requirements.

4. The parties of this action are citizens of different states as alleged and admitted to by the Plaintiffs. The Plaintiffs are adult resident citizens of Simpson County, Mississippi. The Defendant, Montezumas Revenge, Inc., is a Georgia corporation with its principal place of business in Norcross, Georgia. The Defendant, Corey Monshaw Dunbar, is an adult resident citizen of Morrow, Georgia.

5. Pursuant to the provisions of Title 28, U.S.C. §1441 et seq., this civil action is removable by these Defendants.

6. Simultaneously with the filing of this Notice of Removal, the Defendants have given the Plaintiffs written notice of the removal of this civil action and is filing a copy of this Notice of Removal with the Clerk of the Circuit Court of Simpson County, Mississippi.

WHEREFORE, PREMISES CONSIDERED, the Defendants pray that this Notice of Removal, together with the attached exhibits be received and filed and that the Circuit Court of

Simpson County, Mississippi, receive no further herein. The Defendants further pray for all necessary writs to bring before this Honorable Court all records and proceedings currently on file in Simpson County, Mississippi. The Defendants further pray for such other specific and general relief for which it may be entitled to receive in the premises.

Respectfully submitted, this the 14th day of September, 2021.

MONTEZUMAS REVENGE, INC. and  
COREY MONSHAW DUNBAR

BY:   
PATRICK M. TATUM

OF COUNSEL:

PATRICK M. TATUM (MSB# 9852)  
VICTORIA N. MITCHELL (MSB# 105831)  
UPSHAW, WILLIAMS, BIGGERS  
& BECKHAM, LLP  
713 South Pear Orchard, Suite 102  
Ridgeland, Mississippi 39157  
Post Office Box 3080  
Ridgeland, MS 39158-3080  
Telephone: (601) 978-1996  
Facsimile: (601) 978-1949  
[ptatum@upshawwilliams.com](mailto:ptatum@upshawwilliams.com)  
[vmitchell@upshawwilliams.com](mailto:vmitchell@upshawwilliams.com)

**CERTIFICATE OF SERVICE**

I, PATRICK M. TATUM, counsel for Defendants, do hereby certify that I have this date electronically filed the foregoing document with the Clerk of the Court, via ECF system, which sent notification of such filing to the following:

T. Mark Sledge, Esquire  
Attorney at Law, PLLC  
587 Highland Colony Parkway  
Ridgeland, Mississippi 39157  
[mark@sledgelawfirm.com](mailto:mark@sledgelawfirm.com)

Marc E. Brand, Esquire  
Marc E. Brand and Associates  
Post Office Box 3508  
Jackson, Mississippi 39207  
[marc@brandlawfirm.com](mailto:marc@brandlawfirm.com)

CERTIFIED this the 14th day of September, 2021.

  
\_\_\_\_\_  
PATRICK M. TATUM